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UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re:

KINGMAN FARMS VENTURES, LLC,

a Nevada limited liability company,

Debtor.

) CASE NO. 18-10180-LED

) CHAPTER 11

) Hearing Date: OST Requested

) Hearing Time: OST Requested

**MOTION PURSUANT TO 11 U.S.C. § 521, FED. R. BANKR. P. 1007 AND LOCAL
RULE 1007 FOR ORDER EXTENDING TIME TO FILE SCHEDULES AND
STATEMENT OF FINANCIAL AFFAIRS**

KINGMAN FARMS VENTURES, LLC (“Debtor”), debtor and debtor in possession in the above referenced chapter 11 bankruptcy case (“Chapter 11 Case”), hereby submits this motion (“Motion”)for an order pursuant to section 521 of title 11 of the United States Code, 11 U.S.C. §§ 101- 1532 (as amended, “Bankruptcy Code”), rule 1007 of the Federal Rules of Bankruptcy Procedure (as amended, “Bankruptcy Rules”) and rule 1007 of the Local Rules of Bankruptcy Procedure for the District of Nevada (as amended, “Local Rules”), authorizing an extension of time to file the schedules and statements of financial affairs required under

1 Bankruptcy Code section 521(a)(1) (collectively, “Schedules and SOFA”) and, in support
2 thereof, respectfully represent as follows:

- 3 1. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and
4 1334. Venue is proper before this Court pursuant to 28 U.S.C. §§ 1408 and 1409. This
5 is a core proceeding pursuant to 28 U.S.C. § 157(b).
- 6
7 2. On January 16, 2018 (“Petition Date”), Debtor filed with this Court a voluntary petition
8 for relief under chapter 11 of the Bankruptcy Code. Debtor is continuing to operate its
9 business and manage its properties as debtor in possession, pursuant to Bankruptcy
10 Code Sections 1107(a) and 1108. No trustee or examiner has been appointed in the
11 Chapter 11 Case.
- 12
13 3. Pursuant to section 521 of the Bankruptcy Code and Bankruptcy Rule 1007(c), the
14 Debtor is required to file, within fourteen (14) days of the Petition Date, the Schedules
15 and Statement of Financial Affairs. Bankruptcy Rule 1007(c) and Local Rule 1007(d)
16 provide that an extension may be granted for cause on motion with notice to the United
17 States Trustee and appropriate parties.
- 18
19 4. By this motion, and for the reasons detailed below, Debtor requests an extension of the
20 14-day period to file the Schedules and SOFA to a 30-day period pursuant to Bankruptcy
21 Rule 1007(c) and Local Rule 1007(d), without prejudice to Debtor’s ability to request
22 additional time should it become necessary.
- 23
24 5. On the Petition Date, in partial satisfaction of the requirements of Bankruptcy Rule
25 1007, Debtor filed with this Court a list of creditors holding the twenty (20) largest
26 unsecured claims against Debtor’s estate. Due to pressing matters present in the early
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28

1 stages of this case, Debtor anticipates that it will be unable to complete the Schedules
2 and SOFA in the 14-day time period established under Bankruptcy Rule 1007(c).

3 6. To prepare its Schedules and SOFA, Debtor must compile a large amount of financial
4 information from books, records, and documents relating to its assets and claims of
5 creditors. This information is voluminous and assembling the necessary information
6 requires a significant expenditure of time and effort on the part of Debtor. While Debtor
7 is working diligently and expeditiously on the preparation of the Schedules and SOFA,
8 resources are limited.

10 7. Accordingly, Debtor submits that, based upon the amount of information that must be
11 assembled and compiled, the limited resources available and the other more pressing
12 items that must be addressed at the inception of this case, good and sufficient cause
13 exists for granting the requested extension of time. At present, Debtor anticipates that it
14 will require at least thirty (30) days to complete the Schedules and SOFA. Debtor
15 therefore requests that the Court extend the filing period up to and including February
16 28, 2018, without prejudice to Debtor's ability to request additional time should it
17 become necessary.
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20 8. Based on the foregoing, Debtor submits that the relief requested herein is necessary and
21 appropriate, is in the best interests of its estate and all other interested parties, and should
22 be granted in all respects.
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1 WHEREFORE, Debtor respectfully requests that the Court grant this Motion and enter
2 an order (i) extending by at least thirty (30) days the time within which Debtor must file its
3 Schedules and SOFA, up to and including February 28, 2018; and (ii) granting such other and
4 further relief as the Court may deem just and appropriate without prejudice to Debtor's ability
5 to request additional time.
6

7 DATED this 29th day of January, 2018.

8 **GHANDI DEETER BLACKHAM**

9 By /s/ Nedda Ghandi

10 Nedda Ghandi, Esq.
11 Nevada Bar No. 11137
12 725 South 8th Street, Suite 100
13 Las Vegas, Nevada 89101
14 *Proposed Attorneys for Debtor*
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EXHIBIT A
PROPOSED ORDER

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UNITED STATES BANKRUPTCY COURT

DISTRICT OF NEVADA

In re:)	CASE NO. 18-10180-LED
)	
)	CHAPTER 11
KINGMAN FARMS VENTURES, LLC,)	
a Nevada limited liability company,)	Hearing Date:
)	
Debtor.)	Hearing Time:
)	
)	

**ORDER GRANTING MOTION PURSUANT TO 11 U.S.C. § 521, FED. R. BANKR. P.
1007 AND LOCAL RULE 1007 FOR ORDER EXTENDING TIME TO FILE
SCHEDULES AND STATEMENT OF FINANCIAL AFFAIRS**

The Court, having reviewed and considered Debtor's1 Motion (the "Motion") for an order, pursuant to section 521 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (as

1 amended, "Bankruptcy Code"), rule 1007 of the Federal Rules of Bankruptcy Procedure (as
2 amended, the "Bankruptcy Rules") and rule 1007 of the Local Rules of Bankruptcy Procedure
3 for the District of Nevada (as amended, the "Local Rules"), authorizing an extension of time to
4 file the schedules and statements of financial affairs required under Bankruptcy Code Section
5 521(a)(1) (collectively, "Schedules and SOFA"); appearances having been noted on the record,
6 the arguments made by counsel, and the evidence submitted at the hearing on the Motion, and
7 with the findings of the Court having been made on the record and incorporated herein, pursuant
8 to Bankruptcy Rule 7052;

10 Notice of the Motion having been provided to the Office of the United States Trustee
11 for the District of Nevada ("UST"), those creditors holding the twenty (20) largest unsecured
12 claims, parties which filed and served on Debtor a request for special notice prior to entry of
13 this Order; and it appearing that no other or further notice of the Application need be provided;
14 good and sufficient cause appearing therefore;

16 **IT IS HEREBY ORDERED** that the Motion is granted; and

18 **IT IS FURTHER ORDERED** that the time within which Debtor must file its Schedules
19 and SOFA is extended up to and including February 28, 2018, without prejudice to Debtor's
20 ability to request additional time.

21 **IT IS SO ORDERED.**

22 Respectfully submitted this ____ day of January, 2018.

24 **GHANDI DEETER BLACKHAM**

25 By /s/ Nedda Ghandi
26 Nedda Ghandi, Esq.
27 Nevada Bar No. 11137
28 725 South 8th Street, Suite 100
Las Vegas, Nevada 89101
Proposed Attorneys for Debtor

LR 9021 CERTIFICATION

In accordance with LR 9021, counsel submitting this document certifies that the order accurately reflects the court's ruling and that (check one):

☐ The court has waived the requirement set forth in LR 9021 (b)(1).

☐ No party appeared at the hearing or filed an objection to the motion.

☐ I have delivered a copy of this proposed order to all counsel who appeared at the hearing, and any unrepresented parties who appeared at the hearing, and each has approved or disapproved the order, or failed to respond, as indicated below [list each party and whether the party has approved, disapproved, or failed to respond to the document].

☐ I certify that this is a case under Chapter 7 or 13, that I have served a copy of this order with the motion pursuant to LR 9014(g), and that no party has objected to the form or content of the order.

I declare under penalty of perjury that the foregoing is true and correct.

GHANDI DEETER BLACKHAM

By /s/ Nedda Ghandi
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